

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT BECKLEY**

MOUNTAIN VALLEY PIPELINE, LLC,

Plaintiff,

v.

CIVIL ACTION NO 5:23-CV-00625

MELINDA ANN TUHUS, and  
ROSE ZHENG ABRAMOFF

Defendants.

**AMENDED NOTICE OF DEPOSITION OF MOUNTAIN VALLEY PIPELINE, LLC  
PURSUANT TO FED. R. CIV. P. 30(b)(6)**

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, Counsel for Defendants Melinda Ann Tuhus and Rose Zheng Abramoff, will take the deposition of Mountain Valley Pipeline, LLC (“MVP”) on **Friday, November 15, 2024 at 10:00 A.M.**, remotely via Zoom videoconferencing, and continued until concluded. The deposition will be taken upon oral examination and recorded by audio, audiovisual, and/or stenographic means for the purposes of discovery or evidence or both before an officer duly authorized by law to administer oaths, and the same will continue from day to day until completed.

Pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiff shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf as to matters known or reasonably available to Defendants regarding the following topics:

1. The subject matter of all Requests for Admission that have been denied, including the subject matter of all related Interrogatories and Requests for Production. The scope of this request specifically includes:
  - a. Requests for Admissions 11 and 13 in Defendant Tuhus’ First Discovery Request and related discovery requests 14-16.

- b. Request for Admissions 6, 8, 9, 10, and 11 in Defendant Abramoff's First Discovery Request, related Interrogatories 6-9 and 11-12, and related Requests for Production 3-5 and 9.
  - c. Request for Admissions 6, 9, 10, 11, and 12 in Defendant Tuhus' First Discovery Request, related Interrogatories 6-9 and 11-12, and related Requests for Production 3-6 and 9.
- 2. All contracts and/or documents upon which MVP may rely upon to establish its claims for trespass and/or tortious interference.
- 3. The November 30, 2017 Pipeline Right of Way and Easement Agreement between MVP and the Wiseman Living Trust.
- 4. The April 11, 2017 Land License Agreement between MVP and CXS Transportation, Inc.
- 5. The contracts produced by MVP at 00122-00128, 00200-00252, and 00270-00364 of discovery.
- 6. The completeness or lack thereof of MVP's response to Request for Production No. 8 of the discovery requests served on September 16, 2024.
- 7. The accuracy and completeness of prior deposition testimony of EQM/EQT/Global Security witnesses Justin Caprio, Ralph Wright, Scott Dunn, Brian Murphy, and Adam Sloane.
- 8. The specific work schedules and tasks of all workers and/or contractors on site on September 7, 2023 at the Subject Property and any related documents in MVP's possession, including the daily reports referenced by Adam Sloane in his November 6, 2024 deposition and the recently produced scatter sheet.
- 9. The specific duration of the Greenbrier boring operation and any other projects that MVP alleges or may allege are at issue in this litigation, including the date and time each project was commenced and completed.
- 10. The terms (including duration and price) of all rental contracts for all rented equipment that MVP claims as a basis for damages in this litigation, including any changes or amendments to any such agreements following the events of September 7, 2023.
- 11. Any and all bases for MVP's claim for at least \$56,446.90 in damages, and the documents or evidentiary material on which this alleged damage figure is based, including all data and documents underlying the spreadsheet produced at Bates No. 267, MVP's discovery

responses asserting damages, and any other documents asserting or containing the alleged damages figure(s).

12. The relevant portions of the Fiscal Responsibility Act referenced in MVP's Supplemental Rule 26(a)(1) Initial Disclosures filed October 30, 2024.
13. The relevant portions of the FERC Certificate referenced in MVP's Supplemental Rule 26(a)(1) Initial Disclosures filed October 30, 2024.

You may attend and defend your interests as they may appear.

**MELINDA ANN TUHUS  
ROSE ZHENG ABRAMOFF**

By Counsel

/s/ Jonathan Sidney  
Jonathan Sidney  
*Pro Hac Vice*  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Amended Notice of Deposition was filed electronically with the Clerk of the Court, this 13<sup>th</sup> day of November, 2024, and thereby served on Counsel for the Plaintiff as follows:

Timothy M. Miller (WVSB #2564)  
Matthew S. Casto (WVSB #8174)  
Robert M. Stonestreet (WVSB # 9370)  
Jennifer J. Hicks (WVSB # 11423)  
Austin D. Rogers (WVSB #13919)

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/s/William V. DePaulo  
William V. DePaulo